

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

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UNITED STATES OF AMERICA, *ex rel.*

ANTONI MUHAWI,

Plaintiff,

v.

Case No.: 18-CV-02022  
Hon. Manish S. Shah

PANGEA EQUITY PARTNERS,  
PANGEA EQUITY PARTNERS, LP,  
PANGEA EQUITY PARTNERS II, LP,  
PANGEA PROPERTIES,  
PANGEA VENTURES, LLC,  
PANGEA REAL ESTATE, and  
PANGEA REAL ESTATE HOLDINGS, LLC,

Defendants.

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**JOINT STATUS REPORT**

Pursuant to this Court’s October 11, 2024, Minute entry (Dkt. 123), counsel for Antoni Muhawi (“Relator”) and counsel for Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate, and Pangea Real Estate Holdings, LLC (together, “Defendants”) (collectively, the “Parties”) submit this joint status report with an update on discovery progress.

Defendants represented that they completed their production of known, responsive documents in early October 2024. Since that time, the parties have exchanged various letters regarding what Relator has asserted are discovery deficiencies, resolving some disputes but not

others. The parties continue to work in good faith to resolve all disputes, but motion practice may become necessary. Relator has deposed one witness, and depositions of several other witnesses are scheduled to occur in the coming weeks. Relator is in the process of preparing his opposition to Defendants' motion for judgment on the pleadings (Dkt. 127).

Dated: December 9, 2024

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